

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS & TRANSPORTATION
AUTHORITY,

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

ASSURED GUARANTY CORP., *et al.*,

Plaintiffs,

v.

COMMONWEALTH OF PUERTO RICO, *et al.*,

Defendants.

Adv. Proc. No. 17-156-LTS in
17 BK 3567-LTS

Adv. Proc. No. 17-155-LTS in
17 BK 3283-LTS

PEAJE INVESTMENTS LLC,

Plaintiff,

v.

PUERTO RICO HIGHWAYS & TRANSPORTATION
AUTHORITY, *et al.*,

Defendants.

Adv. Proc. No. 17-151-LTS in
17 BK 3567-LTS

Adv. Proc. No. 17-152-LTS in
17 BK 3283-LTS

[PROPOSED] SCHEDULING ORDER

Upon consideration of the urgent motion by Assured Guaranty Corp. (“AGC”), Assured Guaranty Municipal Corp. (f/k/a Financial Security Assurance Inc.) (“AGM” and, together with

AGC, “Assured”), Financial Guaranty Insurance Company (“FGIC”), and National Public Finance Guarantee Corporation (“National,” together with Assured and FGIC, “Insurers”), in support of a parallel briefing and discovery schedule in *Peaje Investments LLC v. Puerto Rico Highways & Transportation Authority, et al.*, Adv. Proc. Nos. 17-151, 17-152 (the “Peaje Action”), and *Assured Guaranty Corp, et al. v. Commonwealth of Puerto Rico, et al.*, Adv. Proc. Nos. 17-155, 17-156 (the “Insurer Action”), and given the Court’s Order Scheduling Hearing, which set an evidentiary hearing in the Peaje Action for August 8, 2017(Dkt. 47), the following deadlines shall apply in the two actions in advance of the evidentiary hearing:

1. **Discovery.** The Peaje Action and the Insurer Action shall be consolidated for purposes of discovery, and the parties shall participate in discovery on the same schedule in both actions.

2. **Briefing for Preliminary Injunction Motion in Peaje Action.**

- a. **June 23, 2017:** Deadline for Insurers to file any motion to intervene or amicus petition.
- b. **July 11, 2017:** Deadline to file: (a) brief(s) in opposition to motion for preliminary injunction; and (b) any opposition to Insurers’ motion to intervene or amicus petition.
- c. **July 28, 2017:** Deadline to file: (a) reply brief in further support of motion for preliminary injunction; and (b) reply in further support of Insurers’ motion to intervene or amicus petition.

3. **Briefing for Partial Summary Judgment Motion in Insurer Action.**

- a. **June 23, 2017:** Deadline to file partial summary judgment motion pursuant to Fed. R. Civ. P. 56 and opening brief.
- b. **July 11, 2017:** Deadline to file brief(s) in opposition to partial summary judgment motion.
- c. **July 28, 2017:** Deadline to file reply brief in further support of partial summary judgment motion.

4. Relief from any deadline in this Order shall be granted for cause shown on application to the Court by the parties in the adversary proceedings.

June __, 2017

SO ORDERED:

**HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE**